



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*610 Federal Plaza, 5<sup>th</sup> Fl.  
Central Islip, New York 11722*

August 23, 2019

Via ECF

Honorable Denis R. Hurley  
United States District Judge  
United States District Court  
100 Federal Plaza  
Central Islip, New York 11722

Re: *United States v. Patel, et al.*, 2:16-cr-00584-DRH-AYS

Dear Judge Hurley:

By memorandum and order dated July 17, 2019 order (Docket Entry No. 151), the Court granted in part and denied in part the government's motion to dismiss the Verified Petition filed by Nalin Patel, individually and as owner and sole member of Neepa Vina Investment, LLC ("NeepaVina") and DNA Hotels, Ltd. ("DNA"), pursuant to Fed. R. Crim. P. 32.2(c)(1)(A). (Docket Entry No. 147) In the decision, the Court dismissed the Verified Petition in all respects except as to the claims regarding: (1) DNA's interest in the LaQuinta Inn property; and (2) NeepaVina's interest in the Texas Inn property. The Court further determined that a hearing on the La Quinta Inn and Texas Inn properties would need to be held and directed the parties to advise the Court if they intend to seek discovery. (Docket Entry No. 151 at 14-15)

The government writes to advise the Court that it does intend to seek discovery in connection with the remaining claims pursuant to Fed. R. Crim. P. 32.2(c)(1)(B). Specifically, the government intends to seek discovery to determine the validity of the remaining claims, and the values of the properties at issue (indeed, should the government conclude that any property has negative equity, it may determine to cease the pursuit of forfeiture). To that end, the undersigned respectfully requests a six-month discovery period (through February 24, 2020) to allow time to serve interrogatories and document demands/subpoenas and to conduct depositions of DNA and Neepa Vina (and its principals) along with other third parties with relevant knowledge.

Thank you for your consideration of this submission.

Respectfully Submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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